

**WASHINGTON**

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September 20, 2010

Marshall Swindell
Office of Pesticide Programs
US Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: Copper Development Association
Antimicrobial Copper Alloys Groups I - VI
EPA Reg. Nos. 82012-1 through 82012-6
PRIA Category A570 – Amendment requiring data submission

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Mr. Swindell:

On behalf of the Copper Development Association (CDA), Technology Sciences Group, Inc, submits the enclosed amendment to add additional alloys to each of the above referenced product registrations. Please see the supplemental product chemistry for specific information submitted herein. You will find the following:

- 1) Application Form,
- 2) Revised Confidential Statement of Formula,
- 3) Certification with Respect to Data Citation,
- 4) Data Matrices,
- 5) PRIA pre-payment receipt,
- 6) Transmittal Document, and
- 7) Three copies of the Supplemental Product Chemistry (Volume 2).

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

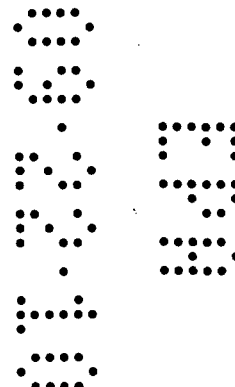
Telephone 613 247-6285

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If you have any questions, please contact me at 202-828-8945 or by e-mail,
hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Consultant, Copper Development Association



VOLUME 1 OF 2 OF SUBMISSION
TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Copper Development Association Inc.
260 Madison Avenue
New York, NY 10016

REGULATORY ACTION:

Submission of product chemistry data to support the addition of additional copper alloys to Antimicrobial Copper Alloys Group III, EPA Reg. No. 82012-3.

TRANSMITTAL DATE:

September 20, 2010

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	GUIDELINE NUMBER
	1 of 2	(Transmittal Document)	-----
48236301	2 of 2	Antimicrobial Copper Alloys Group III Supplemental Product Chemistry	830.1750

COMPANY NAME:

Copper Development Association Inc.

COMPANY OFFICIAL:


Heather R. Bjornson, Regulatory Consultant

COMPANY CONTACT:

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